

## ARREST WARRANT APPLICATION

JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
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For Court Use Only	
Supporting Affidavits sealed	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Police Case number <b>15268-06</b>	Agency name <b>(Sgt. D.S. Youd ) Milford Police Department</b>	Agency number <b>084</b>
Name (Last, First, Middle Initial) <b>PUGH, Matthew</b>	Residence (Town) of accused	Court to be held at (Town) <b>Milford</b>
		Geographical Area number <b>22</b>

## Application For Arrest Warrant

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

Date <b>8-24-2012</b>	Signed (Prosecuting authority) <i>[Signature]</i>	Type/print name of prosecuting authority <b>Kevin D. Lawler</b>
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## Affidavit

The undersigned affiant, being duly sworn, deposes and says:

1. That he is a member of the Milford Connecticut Police Department, currently assigned to the Cold Case Unit at the Chief State's Attorney Office, and is a sworn law enforcement officer in the State of Connecticut. The affiant has law enforcement experience of approximately thirty years and his duties include the investigation of homicides and other crimes of violence. The following facts and circumstances are related from the affiant's personal knowledge and/or observations including information related by police officers and other persons with knowledge of the facts.
2. That the subject of this affidavit is a homicide that took place in Milford, Connecticut in 2006 and is detailed in the following text. Police and other law enforcement investigators over the course of this protracted investigation have collected various forms of evidence through standard law enforcement techniques. In the text of this affidavit certain evidence obtained from this process will be detailed.
3. That on Friday, May 19, 2006, at approximately 4:44 p.m., Officers Cable, Chacon, and Frith, all of the Milford Police Department, were dispatched to 3 Boothbay Street, Milford, Connecticut, in regards to a medical emergency possibly involving a deceased person. Upon arrival these officers met the complainant, Linda Ducsay, who was hysterical and crying. She told the officers that her daughter was in the basement and she thought her daughter was dead. Officers Cable and Frith went to the basement and found the body of a female lying unresponsive on the floor with significant trauma to her head. Additional observations by these officers found that the basement area where the female was lying was consistent with a violent crime scene. Police immediately took steps to protect and preserve the crime scene area consistent with standard law enforcement practices.
4. That fire department personnel who responded to 3 Boothbay Street to treat the female who was laying on the basement floor in short order pronounced her dead at the scene.
5. That the female pronounced dead by the fire department was subsequently identified as Alexandra Ducsay, age 26; of 3 Boothbay Street, Milford, Connecticut.
6. That following the pronouncement of death and the processing of the crime scene, the body of Alexandra Ducsay was taken to the Office of the Chief Medical Examiner in Farmington, Connecticut, for autopsy. At the conclusion of this autopsy, Ira Kanfer, M.D., determined the cause of death as "craniocerebral trauma" and the manner of death was

(This is page 1 of a 11 page Affidavit.)

Date <b>24 - AUGUST - 2012</b>	Signed (Affiant) <i>[Signature]</i>
Jurat Subscribed and sworn to before me on (Date) <b>8-24-12</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i> <b>MAJOR 306</b>

## Finding

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature <i>[Signature]</i>	Signed at (City or Town) <b>Milford</b>	On (Date) <b>8/24/12</b>	Signed (Judge/Judge Trial Referee) <i>[Signature]</i>	Name of Judge/Judge Trial Referee <b>ARNOLD, J.</b>
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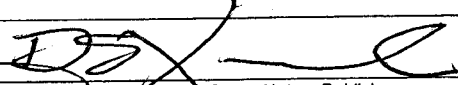
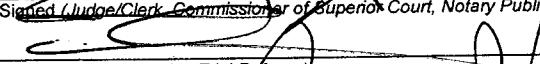
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**Affidavit - Continued**

certified as "homicide". The medical examiner's findings also include that Alexandra Ducsay had multiple blunt force injuries to her head and multiple sharp and blunt force injuries to her upper extremities.

7. That Detective Frank Gall of the Milford Police Department Identification Bureau and the Connecticut State Police Central District Major Crime Squad (CSP CDMCS) photographed and processed the victim and crime scene at 3 Boothbay Street, Milford, Connecticut, as it was found by police. Three Boothbay Street is described as a single family two-story, wood-framed colonial style residence, color brown. It is located in a strictly residential area of Milford. At the time of this incident the victim and her mother, Linda Ducsay, were the sole residents of this home. Detective Gall and CSP CDMCS detectives, as part of processing this crime scene, seized numerous items of evidence. Some of this evidence will be discussed later in the text of this affidavit. These detectives further recorded the savage attack on the victim by memorializing the stark condition of the victim's head and upper extremities along with the vast amounts of blood about the crime scene.
8. That during this investigation police were able to establish a timeline as to when the homicide took place at the victim's residence on May 19, 2006. Jermaine Morton, Alexandra's current boyfriend, said he last spoke to her via telephone at approximately 12:34 p.m. on May 19, 2006. Linda Ducsay, Alexandra's mother, said she returned home from work and found her daughter dead in the basement at approximately 4:30 p.m. on May 19, 2006. Authorities were notified of this incident some 14 minutes later at approximately 4:44 p.m. on May 19, 2006. Therefore, police believe that sometime between 12:34 p.m. and 4:30 p.m. on May 19, 2006, Alexandra Ducsay was attacked and killed.
9. That the manner and extent of this homicide, including the extremely brutal nature of the crime and the injuries to the victim, is indicative of a crime of passion that investigators know from their training and experience shows a familiarity and emotional nexus between the victim and her killer.
10. That Linda Ducsay, when questioned by investigators, said that her daughter, the victim, at one time had a boyfriend, MATTHEW PUGH. Linda said that Alexandra and MATTHEW PUGH had been boyfriend and girlfriend for some considerable period of time starting when Alexandra was 16 years old. During their relationship, MATTHEW PUGH was sent to prison in Connecticut for an extended period of time. Linda went on to say that Alexandra and PUGH's relationship ended while PUGH was in prison. According to Linda, Alexandra and MATTHEW PUGH's breakup had been less than amicable. Linda told police that since their breakup, MATTHEW PUGH would regularly harass and threaten Alexandra.
11. That investigators were able to speak with and interview MATTHEW PUGH concerning this case. Over the course of this protracted investigation, police investigators on several occasions interviewed MATTHEW PUGH and during these he consistently indicated that he had nothing to do with the killing of Alexandra.
12. That investigators later learned that the victim had, in fact, made a complaint to the State of Connecticut Department of Corrections (CT DOC) concerning MATTHEW PUGH and alleged threatening behavior towards her and her family. This complaint was made while PUGH was an inmate within CT DOC. The victim documented this complaint in a letter to CT DOC dated January 23, 2004. In her complaint the victim says PUGH threatened her mother and brother, further saying that he threatened to release compromising photographs of her, the victim, to her employers so as to ruin her reputation. The victim indicated that PUGH did these things over the telephone and in letters sent to her. In

(This is page 2 of a 11 page Affidavit.)

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Reviewed (Prosecutorial Official)	Date 8-24-12	Reviewed (Judge/Judge Trial Referee)	Date 8/25/12

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## Affidavit - Continued

her written complaint to CT DOC, the victim says PUGH was threatening her because she broke off their relationship. CT DOC, in fact, has a copy of a letter PUGH admits to authoring, which was sent to the victim and corroborates what the victim alleged concerning PUGH's behavior. Portions of this letter include PUGH stating to the victim the following, "Maybe you need your ass kicked by some bitch just to get that bitch out of you." PUGH continues, writing, "Your lucky I'm not that kind of nigga because I can really make you look ugly for life." PUGH writes, "I can't do this on my own without you. And as far as you telling me that I'll be straight when I get out in the world but what's really scary is that if you're not by my side I pray for your ass big time ... so if you don't start making time for me and making this bid comfortable for me until I get out, you're gonna regret you ever met me ... I'm tired of being the nice guy from now on I'm going to get on some A.I. shit because you can't change who I am you tried but because of your broken promises, now I have to get ugly with you and who ever else want it ... so if you don't get your ass up here and see me well I will make your life a living hell." This letter continues, generally in the same vein, with other PUGH writings. CT DOC initiated an investigation concerning PUGH, this complaint by the victim and they documented this case in a report --- CT DOC #WCI-0401026. As a result of their investigation, CT DOC disciplined PUGH.

13. That Eric Terranova, brother of the murder victim, during this investigation told police that MATTHEW PUGH, after being released from prison, continually threatened the victim. Terranova indicated that the threats against the victim were serious and indicated they were repeated continually to the victim.
14. That MATTHEW PUGH was released from the CT DOC on August 6, 2004. At the time of the victim's murder, MATTHEW PUGH was residing at 98 North Street, Hamden, Connecticut.
15. That Jermaine Morton, the victim's current boyfriend, when questioned by investigators said that during a telephone conversation he had with Alexandra on the morning of the homicide, May 19, 2006, Alexandra told him to hold on because her ex-boyfriend was at her house. Jermaine said he then overheard Alexandra say, "Why are you here? You were supposed to call first." Jermaine says Alexandra told him she would have to call him back and the telephone call between them was terminated. Jermaine told police that about 10-20 minutes later Alexandra did telephone him back and both then had a normal conversation with no mention of the ex-boyfriend.
16. That detectives spoke to Linda Ducsay who indicated that over the course of her life, Alexandra only had two boyfriends. One was MATTHEW PUGH and the other was Jermaine Morton. Jermaine was Alexandra's current boyfriend at the time of her killing. Accordingly, at the time of her death MATTHEW PUGH would have been an ex-boyfriend.
17. That during the course of this investigation, at various times investigators have spoken to Anthony Pugh, cousin of the accused, MATTHEW PUGH. Anthony had information relevant to the homicide and he gave verbal and written statements concerning his knowledge of MATTHEW PUGH, the victim, and the homicide. On June 19, 2008, Anthony told Sergeant Steven Wydra of the Milford Police Department that in 2005 he and MATTHEW PUGH started working at Chromalloy. At about that time MATTHEW PUGH started talking about killing Alexandra, whom he knew was PUGH's girlfriend. MATTHEW talked with Anthony about using things from work to help cover-up who the murderer of Alexandra would be. MATTHEW PUGH talked with Anthony about taking tape, smocks, boot covers and gloves from Chromalloy for this purpose. Anthony said PUGH talked about and wanted to wear two of everything so he wouldn't leave behind any DNA. During a June 1, 2006, interview Anthony told Sergeant Antonio Vitti of the Milford

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K. O. [Signature]	8-24-12	[Signature]	8/24/12	

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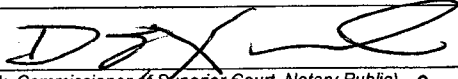
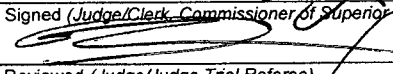
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**Affidavit - Continued**

Police Department that PUGH has a temper and flies off the handle. Anthony continued saying PUGH stated he wanted to fuck that bitch (Alexandra) up and get even. Anthony says MATTHEW was angry because he gave his automobile to the victim and she in turn ended their relationship, keeping the automobile. According to Anthony, MATTHEW said he also gave Alexandra \$20,000.00 prior to the end of their relationship. During a subsequent interview years later with Inspector Michael Sullivan of the Chief State's Attorney's Office conducted on December 10, 2010, Anthony indicated the statements he gave to police years earlier were the truth. Anthony further said he remembered PUGH saying to him that he (PUGH) was going to kill the victim. Anthony said he felt really bad and felt that he should have done something to stop MATTHEW PUGH. During this same interview Anthony said MATTHEW told him he (MATTHEW) used to sit outside the victim's residence and watch to see where she was going and with whom, doing this at least once a week.

18. That this "stalking" of the victim by MATTHEW PUGH, as described by Anthony and indicated in the above text, was significant to the affiant. The affiant knows from his training and experience that "stalking" by criminal offenders is often a precursor to their violent criminal behavior toward the person being stalked.
19. That during May 2011 Inspector Sullivan and this affiant spoke to an inmate in the custody of the CT DOC who had information about MATTHEW PUGH and the murder of the victim. The inmate indicated that PUGH told him that Alexandra, the victim, took \$35,000.00 and his automobile from him. PUGH told this inmate that police think he (PUGH) is responsible for the murder of the victim. PUGH said he did not kill Alexandra. PUGH told this inmate he was arrested on "bull-shit" robbery charges because the "state really wants him" for the Ducsay murder.
20. That MATTHEW PUGH told Sergeant Wydra during a particular interview that he (PUGH) might have given Alexandra \$4,000.00 and she never paid him this money back.
21. That some of the evidence seized by police from the crime scene includes a 1½" wide piece of black tape that was located on the left facial cheek of the victim. A knife blade was discovered on the floor under the left facial cheek of the victim. Three (3) swabbings, one of which was subsequently marked as Submission #21-S1, of what was later determined to be blood were taken from the first floor bathroom. It is noted that the crime scene for this incident was located solely in the basement of the residence and was not on the first floor, which includes the bathroom where the blood evidence described in this paragraph was located. The blood evidence located in the first floor bathroom is indicative of MATTHEW PUGH attempting to clean up and destroy evidence immediately subsequent to the murder of the victim. MATTHEW PUGH's use of the first floor bathroom to clean up is consistent with his stated concern, to his cousin Anthony, not to leave any DNA behind.
22. That in particular the 1½" piece of black tape discovered on the cheek of the victim was marked Submission #10 and one swabbing of the blood was marked Submission #21-S1. These submissions were subsequently sent to the State of Connecticut Department of Public Safety, Division of Scientific Services Forensic Science Laboratory (DPS Laboratory) for examination.
23. That it was learned that Chromalloy of 601 Marshall Phelps Road, Windsor, Connecticut, employed MATTHEW PUGH at the time of the murder. Detectives learned that in the area MATTHEW PUGH works at Chromalloy, there are accessible black tape rolls in 1½" widths. This is the same type of black tape found on the left cheek of murder victim Alexandra. During this investigation detectives learned that this is a unique and not commonly sold style/size of black tape.

(This is page 4 of a 11 page Affidavit.)

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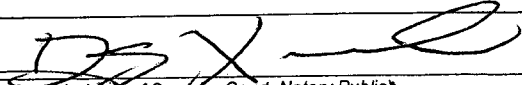
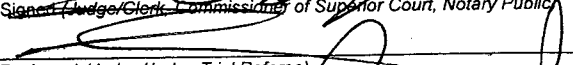
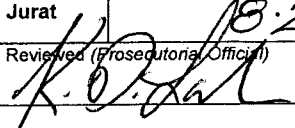
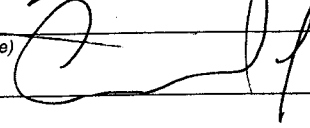
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**Affidavit - Continued**

24. That later during this investigation Sergeant Wydra learned that Chromalloy receives their black tape from vendor New London Tape Distributors of Niantic, Connecticut. This tape is exactly described as Permacel Model P-34, 1½" black vinyl tape. New London Tape Distributors indicated that it only sells Permacel Model P-34, 1½" black vinyl tape to three (3) customers. These customers are Chromalloy of Windsor, Connecticut; Adchem Incorporated of Manchester, Connecticut; and, Grand Stone Incorporated of Westerly, Rhode Island. According to Debra Ludden of Permacel, the Permacel Model P-34, 1½" black vinyl tape is not sold at outlet stores or online. Debra Ludden said that the only distributor of Permacel Model P-34, 1½" black vinyl tape in Connecticut and surrounding states is New London Tape Distributors.
25. That investigators took custody of samples of Permacel Model P-34, 1½" black vinyl tape from Chromalloy as evidence exhibits, marking them Submission #32 and subsequently sent these samples to DPS Laboratory for examination.
26. That on May 26, 2006 a search warrant was executed at MATTHEW PUGH's residence, 98 North Street, Hamden, Connecticut. During the search of this residence certain evidence was discovered and taken by police as exhibits. Found in the kitchen at the computer workstation was a roll of black tape (Tag #70438). The inner label in this tape's core listed its manufacturer as Permacel and the tape was 1½" in width. Discovered in the basement inside a garbage can adjacent to the washing machine was a portion of black tape tightly wound in an overlapping spiral and folded in half (Tag #70435). Located in the kitchen was a lint roller brush wound with black tape (Tag #70437). Based on these evidentiary findings, it is obvious MATTHEW took possession of Permacel Model P-34, 1½" black vinyl tape from his place of employment, Chromalloy, and left the factory grounds. The tape seized from MATTHEW's residence is the same type of unique tape discovered on the face of the murder victim.
27. That the DPS Laboratory conducted a subsequent examination of select evidence exhibits seized during this investigation. Addressed here is a DPS Laboratory examination and comparison between the tape discovered on the victim's facial cheek (Submission #10) and the tape samples taken by police from Chromalloy (Submission #32). The DPS Laboratory, as a result of their examination, concluded Submission #10 exhibited physical characteristics similar to Submission #32. Further, the DPS Laboratory concluded the adhesive and backing of Submission #10 exhibited similar instrumental characteristics to Submission #32. As had been already stated in this affidavit, the tape described herein is unique and not commonly sold, possessed, or used.
28. That the DPS Laboratory also conducted deoxyribonucleic acid (DNA) examinations on select evidence exhibits in this case. The evidence exhibits described in the following text were seized, via consent or valid warrant, and subsequently sent to the DPS Laboratory for these DNA examinations. The evidence exhibits that were examined by the DPS Laboratory included the swabbing of blood, evidence exhibit Submission #21-S1, taken from the first floor bathroom countertop of the murder victim's residence. During the course of this investigation MATTHEW PUGH consented to and voluntarily provided a "buccal swab" DNA sample, which was consequently held as Submission #33. Known blood from the victim, Alexandra Ducsay, was obtained and after held as Submission #35-S1. These exhibits were analyzed by standard DPS Laboratory protocols. The DPS Laboratory, as a result of their examination, concluded the DNA Identifier results demonstrate that blood swabbing; Submission #21-S1, is a DNA mixture. DPS Laboratory findings include that Alexandra Ducsay, Submission #35-S1, is included as a contributor to the DNA profile of blood swabbing, Submission #21-S1. Further findings show MATTHEW PUGH's DNA sample, Submission #33, cannot be eliminated as a minor contributor to the Identifier DNA profile of blood swabbing, Submission #21-S1. The DPS

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## Affidavit - Continued

Laboratory findings go on to specify that MATTHEW PUGH's DNA sample, Submission #33, shows that MATTHEW PUGH, or another member of the same paternal lineage, is included as a contributor to the PowerPlex-Y DNA profile of blood swabbing, Submission #21-S1. That during an interview early on in this investigation, MATTHEW PUGH told police he had never been inside the Ducsay residence at 3 Boothbay Street, Milford, Connecticut.

29. That subsequently, Linda Ducsay, mother of the victim, who lived with Alexandra at 3 Boothbay Street, Milford, Connecticut, indicated the following concerning MATTHEW PUGH being in the residence. Linda said that it had been many years prior to the murder of her daughter that MATTHEW PUGH was last in 3 Boothbay Street. This was approximately in the year 2002 time frame. She indicated that when PUGH was last inside the residence, he was not in the bathroom and was only in the house for a very short time before being ejected by her husband. Linda said that since the last time PUGH was in the residence, many years before the murder, she regularly cleaned the bathroom where the blood evidence was discovered immediately after the murder of the victim. Linda also said that while MATTHEW PUGH was in jail, around the year 2002, his father and cousin did briefly visit her house to deliver tires. Both were only in the basement and never in the bathroom where the blood evidence was discovered years later.
30. That investigators learned that MATTHEW PUGH, at the time of the murder, had cellular telephone service with Sprint/Nextel Communications and had cellular telephone #203-704-0164 subscribed to him. Discovered during a Sprint/Nextel Communications records review, via search warrant, was the fact that MATTHEW PUGH's telephone had contact with the victim on her cellular telephone. That detectives know the victim's cellular telephone number to be #203-521-0422 of Verizon Wireless. Police on May 18, 2006, as well as other dates, noted cellular telephone contacts between the victim and MATTHEW PUGH's cellular telephone. Specifically, on May 18, 2006, the day before the murder, MATTHEW PUGH's cellular telephone, via the records associated with it, shows his cellular telephone number to have initiated contact with the victim's cellular telephone numerous times, including the following:
- 1.) May 18, 2006 at 3:21 p.m.
  - 2.) May 18, 2006 at 3:22 p.m.
  - 3.) May 18, 2006 at 3:22 p.m.
  - 4.) May 18, 2006 at 3:24 p.m.


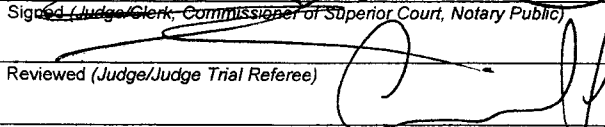
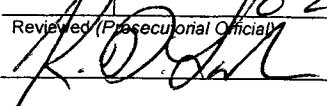
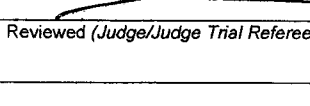
Also noted on May 18, 2006 was a cellular telephone contact between the victim and MATTHEW PUGH in which this contact was initiated by the victim, where she blocked her telephone call before attempting contact with PUGH:

- 1.) May 18, 2006 at 7:50 p.m.

31. That consequently, Sergeant Andrew Weaver of the Hartford Police Department was contacted and his assistance and expertise requested concerning the Alexandra Ducsay homicide. Sergeant Weaver was formerly assigned to the Connecticut Intelligence Center (CTIC) as the Capital Region Intelligence Liaison Officer. In addition to this assignment, Sergeant Weaver is trained in cellular telephone and computer forensics. Sergeant Weaver is further trained by the FBI in the mapping of cellular telephone calls. Over the course of his police career, Sergeant Weaver has successfully investigated various incidents in which he was required to map cellular telephone calls.

32. That on the day of the homicide, May 19, 2006, police know that MATTHEW PUGH was in possession of his cellular

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## Affidavit - Continued

telephone, #203-704-0164. Investigators were able to determine this based on statements made by MATTHEW PUGH himself, telephone records, and PUGH's cousin, Anthony Pugh. Anthony told police he saw MATTHEW PUGH in possession of his cellular telephone while both were working at Chromalloy in Windsor, Connecticut, early that morning. Cellular telephone records and cellular telephone tower records establish activity concerning telephone #203-704-0164, to include:

- 1.) May 19, 2006: 6:47 a.m. Windsor, Connecticut (cell tower #144-32661)
- 2.) May 19, 2006: 6:48 a.m. Windsor, Connecticut (cell tower #144-32661)
- 3.) May 19, 2006: 9:04 a.m. Rocky Hill, Connecticut (cell tower #540-1515)
- 4.) May 19, 2006: 9:15 a.m. Wallingford, Connecticut (cell tower #136-14653)
- 5.) May 19, 2006: 11:47 a.m. Milford, Connecticut (cell tower #4311-2436)
- 6.) May 19, 2006: 11:49 a.m. Stratford, Connecticut (cell tower #4311-13152)
- 7.) May 19, 2006: 12:07 p.m. Milford, Connecticut (cell tower #4311-2436)
- 8.) May 19, 2006: 1:09 p.m. Milford, Connecticut (cell tower #4311-2436)
- 9.) May 19, 2006: 2:18 p.m. Hamden, Connecticut (cell tower #17019-34229)
- 10.) May 19, 2006: 2:19 p.m. Wallingford, Connecticut (cell tower #136-32128)

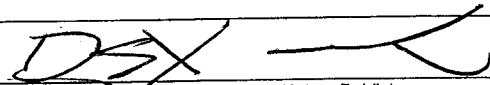
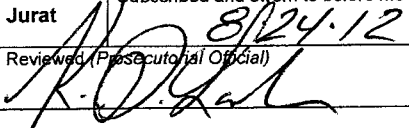
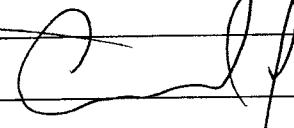
33. What an examination of the above activity clearly demonstrates is PUGH leaving Chromalloy in Windsor, consistent with what he told investigators, and driving south along, among other roadways, the Wilbur Cross Parkway (CT Route 15). Subsequently, PUGH is known to have driven along the Interstate 95 corridor in Milford, though PUGH denies this. In fact, PUGH states that he was never in Milford on May 19, 2006. Sergeant Weaver's study of the PUGH cellular activity during the critical time period (when the murder is known to have taken place) indicates MATTHEW PUGH's cellular telephone as being along the Interstate 95 corridor in a small area close by and containing the victim's residence, 3 Boothbay Street, Milford, Connecticut. Specifically, examination of the cellular telephone calls made by PUGH's cellular telephone at 11:47 a.m. and 12:07 p.m. indicate that PUGH's cellular telephone was in the area of Milford just northwest of the victim's residence. Examination of the cellular telephone call received by PUGH's cellular telephone at 1:09 p.m. indicates PUGH's cellular telephone was in a section of Milford that includes the victim's residence.

34. That police know the homicide took place sometime between 12:34 p.m. and 4:30 p.m. on May 19, 2006.

35. That during questioning, MATTHEW PUGH told police he was not in Milford at any time on May 19, 2006. This obvious false statement, it is submitted, is made with deliberate intent to deceive police investigators.

36. That during the critical timeframe when police know the murder of the victim took place (12:34 p.m. to 4:30 p.m.) PUGH is lying about his whereabouts. PUGH says that at 12:00 p.m. he was on Dixwell Avenue (Hamden, Connecticut) at a Hess gasoline station. PUGH's cellular telephone records show he was in the Milford, Connecticut area (cell tower #4311-2436 Milford) at 11:47 a.m. He goes on to tell police that from 12:15 p.m. to 12:40 p.m. he was on Putnam Street (New Haven, Connecticut) at an unnamed car dealership looking at automobiles for sale. His cellular telephone records again show he was in the Milford, Connecticut, area (cell tower #4311-2436 Milford) at 12:07 p.m. to 1:09 p.m. The reasons for these particular lies are obvious --MATTHEW PUGH is attempting to create an alibi and distance himself from the murder location and the killing of the victim.

(This is page 7 of a 11 page Affidavit.)

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Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
	8-24-12		8/24/12

## ARREST WARRANT APPLICATION

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C.G.S. § 54-2a  
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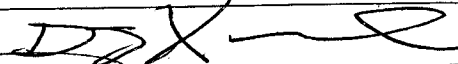
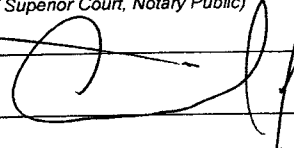
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## Affidavit - Continued

37. That MATTHEW PUGH told investigators the following information early on in this investigation. On the day of the victim's murder (May 19, 2006) he worked at Chromalloy (Windsor, Connecticut) from 6:30 a.m. to 9:00 a.m. when he drove home (Hamden, Connecticut). Chromalloy records show PUGH working from 6:36 a.m. to 8:39 a.m. PUGH told Robert Jones, his boss at Chromalloy, that he needed to go home because his stepdaughter was just suspended from Hamden High School. A check with the Hamden Police Department shows that, in fact, this excuse for leaving work was a falsehood. PUGH's stepdaughter was not suspended from school on May 19, 2006, but was suspended from school for an incident that took place on May 17, 2006, Hamden Police Report #0600019815. PUGH says that once at home he checked on his stepdaughter (Chamira Trotman) and found her sleeping. According to PUGH, he stayed home that morning and lifted weights from 10:05 a.m. until 11:15 a.m. in the basement. When questioned by police, Chamira Trotman said she awakened at 10:00 a.m. on May 19, 2006, and went to a local diner to eat and then returned home. Chamira says she did not see PUGH all morning at their house, did not hear him lifting weights, and finally did not see his automobile parked in the driveway. Charise Trotman, MATTHEW PUGH's wife, gave a statement to police investigators indicating the following concerning teletype conversations she had with PUGH on the day of the victim's murder. Charise indicated that sometime around lunch (May 19, 2006) she called PUGH on his cell phone (704-0164) and spoke to him, though she does not remember what they talked about. Charise also said she called PUGH on his cell phone sometime between 3:10 and 3:15 p.m. (May 19, 2006). During this telephone conversation, PUGH told Charise that he had just gotten out of work and was on his way to Papa Johns to get his check. In fact, PUGH had not just gotten out of work, but had left work for the day early that morning. As previously mentioned, he had left work, according to Chromalloy records, at 8:39 a.m. that morning. MATTHEW PUGH communicated these falsehoods concerning his activities and location to investigators and Charise with the deliberate intention of misleading police and creating an alibi to help distance himself from the murder location and the killing of the victim.
38. That on September 15, 2011 this affiant met with Connecticut Department of Corrections (CT DOC) Inmate Paul O'Connor who indicated that he had information about the Ducsay murder. O'Connor said Christopher Richards, at the time from Milford, killed the victim. O'Connor said that the day after the murder he was called by and met with Christopher Richards and Christopher's sister, Shannon, on the seawall at Point Beach in Milford. During their meeting, which lasted 45 minutes, Shannon told him that Christopher had stabbed the victim the day before. Christopher, who was present, did not confirm or deny what Shannon said as she was saying it. Shannon said the homicide took place at the victim's residence. O'Connor said during this meeting that he noticed Christopher "was covered in blood". When further questioned, O'Connor said Christopher had blood on his hands and shirt. O'Connor continued saying Christopher had dated the victim, Alexandra, for two years prior to her death. O'Connor said Christopher would show him photographs of Alexandra on his (Christopher's) cellular telephone. The affiant asked O'Connor if he had told anyone else this information and he said he told his girlfriend, Krystal McNinch.
39. That the victim's family, mother and brothers, said they never heard of Christopher or Shannon Richards. Nicole Williamson, best friend of the victim, also said she had never heard of Christopher or Shannon Richards.
40. That this affiant was able to subsequently question Krystal McNinch who indicated that she and O'Connor were at one time married, but she left him because he was extremely abusive toward her. McNinch said she knew what Christopher Richards looked like and had heard of Shannon. This affiant asked Krystal if O'Connor ever told her Christopher, or anyone else for that matter, had killed the victim. Krystal said O'Connor never told her anything about

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## Affidavit - Continued

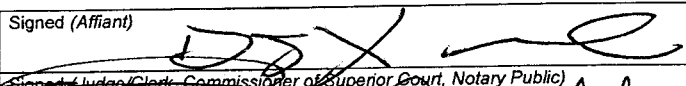
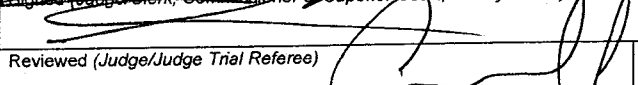
a homicide (emphasis added). This directly contradicts what O'Connor told investigators. Krystal said O'Connor is a "pathological liar" and that the affiant should be suspicious of anything he says.

41. That a CT DOC inmate status check for Paul O'Connor was conducted and a portion of this check reveals that O'Connor has a CT DOC classified elevated mental status. This classification is indicative of concerns with his intellectual state of well-being. A CT DOC check also shows a disciplinary action against Paul O'Connor for giving false information dated June 8, 1999. In summary, this formal internal CT DOC investigation confirms that O'Connor, by his own admission,

lied about being assaulted by another inmate in an incident unrelated to this homicide investigation. As a result, he was sanctioned, receiving an official CT DOC disciplinary punishment. The CT DOC report number for this disciplinary action is CR9906-053.

42. That in reference to the information provided by Inmate O'Connor, this affiant has been unable to confirm the critical points at issue concerning Christopher and Shannon Richards. After extensive investigation into the matter of Christopher and Shannon Richards, it was determined not to be a credible lead in terms of the Ducsay murder.
43. That on September 27, 2011 the affiant was informed that Jeremy Shoffner had information concerning the homicide. This affiant subsequently met with and interviewed Shoffner. He indicated that during March or April of 2006 he had a conversation with the victim, Alexandra, whom he indicated he was friendly with. According to Shoffner, Alexandra said she had borrowed \$8,000.00 from a "loan shark" she called Donovan Campbell to help pay for her automobile. She said Campbell was a "Jamaican gang member" from Mount Kisco, New York. According to Shoffner, Alexandra told him she was having difficulty repaying the loan to Campbell and Campbell was, as a result, threatening her. Shoffner said Alexandra told him that Campbell threatened to kill her. This affiant asked if Shoffner had ever met Campbell and he indicated he never saw or met Campbell. Shoffner said Alexandra mentioned this just once and never said anything else about this in their many subsequent meetings and conversations. It is unclear which of the victim's automobiles Shoffner was talking about.
44. That early on in this investigation detectives received documentation, People's Bank cashiers checks, showing that the victim paid MATTHEW PUGH's father, Thomas, \$2,000.00 on October 14, 2002 as payment in full for the 1993 Nissan 300ZX. This check was cashed on October 14, 2002. This payment for the automobile controlled by MATTHEW PUGH, registered to his father, and sold to the victim. The victim subsequently sold this automobile. Because the vehicle was valued at \$2,000.00, there would have been no need for \$8,000.00 from a "loan shark". Based on the information learned by investigators, there would be no need on the part of the victim to entertain the services of a "loan shark" concerning this Nissan automobile.
45. That Alexandra Ducsay at the time of her death owned a 1997 Mitsubishi 3000GT automobile. During the course of this investigation it was learned that the victim purchased this vehicle on March 12, 2004 for \$12,600.00. Further, the Connecticut Department of Motor Vehicles (CT DMV) records show there were no liens on this particular automobile owned by the victim as of the date she purchased this automobile. The victim owned the vehicle outright. A review

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of the victim's financial banking records, during the time period which include her automobile purchase date and murder date, exhibits she was solvent. In particular, her People's Bank financial records show the following:

## 1.) People's Bank Account #134-000316-06

March 5, 2004 balance of \$31,557.56

March 25, 2004 balance of \$34,080.57

Between the above two dates the victim purchased her automobile and both before/after balances show a significant amount of money available to the victim.

## 2.) People's Bank Account #016-8019621-05

May 30, 2006 balance of \$20,119.85

The above date is eleven days after the murder of the victim and this account also shows a significant amount of money available to the victim.

## 3.) People's Bank Account #014-0115258

February 28, 2004 balance of \$14,018.67

This date is several months before the victim was killed.

March 12, 2004 a withdrawal of \$12,600.00 and a new balance of \$1,418.67.

This is the date the victim purchased her automobile.

May 16, 2006 balance of \$1,988.11

This above date is some three days before the victim was killed.

## 4.) People's Bank Account #001-0287883-04

May 30, 2006 balance of \$2,132.91

The above date is eleven days after the murder of the victim and this account also shows a substantial amount of money available to the victim.

46. Based on the above-learned information, investigations know there would be no need on the part of the victim to seek the services of a "loan shark" concerning this Mitsubishi automobile.

47. That police attempts to locate Donovan Campbell all met with negative results. Mount Kisco, New York Police have no record of this individual. The affiant has checked various information databases available to police and no Donovan Campbell from Mount Kisco, New York, was identified. The affiant inquired with family members, including the victim's mother and two brothers, and all said they don't know any Donovan Campbell, further saying that they were not aware of Alexandra using a "loan shark" to purchase any motor vehicle. Nicole Williamson, best friend of the victim, was questioned and she said she did not know any Donovan Campbell. She also said that the victim did not borrow money from people. At the time of her killing, Alexandra Ducsay was employed by People's Bank, working at a branch office in Stratford, Connecticut.

48. That the investigative conclusions made by detectives concerning the "loan shark" investigative lead calls into question the ultimate credibility of the Shoffner's information. Based on the lack of credible information concerning

(This is page 10 of a 11 page Affidavit.)

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## Affidavit - Continued

this particular lead, it was determined that this "loan shark" lead was not plausible in terms of it being a likely motivation in the Alexandra Ducsay murder.

49. That MATTHEW PUGH, date of birth June 19, 1972, is currently in the custody of the State of Connecticut Department of Corrections (CT DOC) being held on unrelated state criminal charges.
50. Wherefore, the affiant has probable cause to believe and does believe that on or about May 19, 2006, in the City of Milford, Connecticut, the accused, MATTHEW PUGH, date of birth June 19, 1972, did commit Murder, Connecticut General Statutes 53a-54a, and Burglary, 1st Degree, 53a-101, Connecticut General Statutes.

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